

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT VALDEZ

OLGA ROSEBERRY, )  
)  
Plaintiff, )  
)  
v. )  
)  
SAFEWAY INC., )  
)  
Defendant. )  
\_\_\_\_\_)

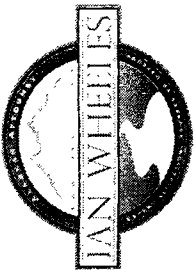
Case No. 3VA-12- \_\_\_\_\_ CI

**COMPLAINT**

COMES NOW Plaintiff, OLGA ROSEBERRY, by and through her attorney, Law Office of Ian Wheelles, and complains and alleges against Defendant, Safeway, Inc., as follows:

1. Olga Roseberry, is now and was at the time of the incident in question a resident of the State of Alaska.
2. Safeway, Inc. is believed to be a foreign corporation doing business in the State of Alaska.
3. On January 18, 2010 Olga Roseberry slipped and fell at the corner of the store sidewalk of the Safeway store in Valdez, causing injury to herself.
4. Defendant had a duty to properly maintain the property where the incident occurred and was negligent in breach of such duty. Defendant's negligence has actually and proximately caused damage to Ms. Roseberry.
5. Ms. Roseberry has suffered the following past and future harms and losses legally caused by Defendant's complained of conduct as follows:
  - a. Pain and suffering and emotional distress.
  - b. Loss of enjoyment of life.

Law Office of Ian Wheelles  
601 E. 57<sup>th</sup> Place, Ste. 101  
Anchorage, Alaska 99518  
Phone (907) 375-5561 | Fax (907) 375-5562




- c. Medical expenses.
- d. Loss of earnings and earning capacity.

6. These losses and harms will be proven with specificity at trial but are in excess of \$100,000.00.

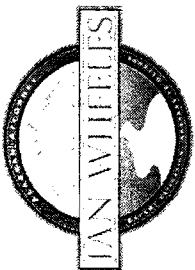
WHEREFORE, Olga Roseberry requests the following relief:

- A. That Judgment be entered in her favor and against Safeway, Inc.
- B. That she be awarded damages to compensate her for her actual, general, past, and future economic and noneconomic damages caused by Safeway Inc., in excess of \$100,000.00 in an exact amount to be proven at trial.
- C. That she be awarded costs, interest, and attorney's fees as permitted by rule and statute.
- D. For such other relief as the court deems just and equitable.

Dated: 1/11/12

  
\_\_\_\_\_  
Ian Wheelles  
ABA #0805033

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Anchorage, Alaska 99518  
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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT VALDEZ

Olga Roseberry,

Plaintiff,

vs.

SAFEWAY, INC.,

Defendant.

CASE NO: 3VA-12-00005CI

**SUMMONS AND NOTICE TO BOTH PARTIES  
OF JUDICIAL ASSIGNMENT**

To Defendant: SAFEWAY, INC.

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 213 Meals Avenue PO Box 127 Valdez AK 99686 within 20 days\* after the day you receive this summons.

In addition, a copy of your answer must be sent to:

Plaintiff's attorney or plaintiff (if unrepresented): Ian Wheelles

Address: 601 E 57th Pl Suite 101 Anchorage AK99518

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at [www.state.ak.us/courts/forms.htm](http://www.state.ak.us/courts/forms.htm), to inform the court.

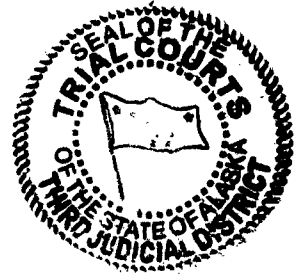
-OR-

If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

**NOTICE OF JUDICIAL ASSIGNMENT**

To: Plaintiff and Defendant

You are hereby given notice that this case has been assigned to Judge Daniel Schally.



CLERK OF COURT

By:

Aunalia DeLozier  
Deputy Clerk

1/19/2012

Date

\*The state or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

I certify that on 1/19/12  
a copy of this order was mailed to:  
I. Wheelles to serve on def

Clerk: ADeLozier